



Order Filed on March 13, 2023
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in compliance with D.N.J. 9004-1(b)

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**IN RE:
JONOTHAN FOREMAN,**

Debtor

Case No.: 22-16089-VFP

Chapter 13

Judge: Vincent F. Papalia

Hearing Date: March 2, 2023 at 10:00 AM

**CONSENT ORDER MODIFYING STAY AS TO MOTOR VEHICLE
2011 Mercedes-Benz GL-Class Utility 4D GL550 4WD 5.5L V8**

The relief set forth on the following pages, number two (2) through three (3) is hereby **ORDERED**.

DATED: March 13, 2023

A handwritten signature in black ink, appearing to read "Vincent F. Papalia".

Honorable Vincent F. Papalia
United States Bankruptcy Judge

Debtor: Jonothan Foreman

Case No.: 22-16089-VFP

Caption of Order: Consent Order Modifying Stay as to Motor Vehicle

1. The 11 USC § 362(a) Stay as to Ally Capital, its successors and/or assigns ("Movant"), with respect to the personal property of the Debtor described as a 2011 Mercedes-Benz GL-Class Utility 4D GL550 4WD 5.5L V8, V.I.N. 4JGBF8GE3BA738682, in accordance with the agreement of the Debtor and Movant, is hereby modified and shall remain in effect PROVIDED THAT Debtor comply with the following terms and conditions:
 - a. **Debtor is to pay Post Petition arrearages in modified plan:** The parties stipulate that unpaid amount due Post Petition arrearages are \$514.46 ("Arrearages"). Within 30 days of entry of this Order, the Debtor must (i) pay the Movant half of the Post Petition Arrearages; and

(ii) file a proposed modification of the confirmed plan to add the rest of the arrearages in the plan. If the Debtor fails to file a modification or pay the half Arrearages and fails to do either, it is a Final Default under this order.
 - b. **Current Monthly Payments:** Debtor shall continue to remit to Movant the regular post-petition monthly payments of \$392.91, beginning February 24, 2023.
2. Six Months Strict Compliance: Debtor consent to a six-month period of strict compliance with the chapter 13 plan, which period shall begin running on the date this order is entered.
3. A default will occur in the event, if (1) Movant does not receive a regular post-petition monthly payment by the due date as set forth above in paragraph 1, supra, (2) Debtor fails to file modification of plan or pay the Movant half of the Post Petition arrearages, within 30 days of entry of this order, (3) Debtor misses another plan payment within the six-month period as set forth above in paragraph 2, (4) Debtor fails to keep the Collateral insured, (5) Collateral is total loss. If Debtor defaults in any way, then Movant may send written notice of the default to Debtor and Counsel for Debtor by Regular Mail and by Certified Mail Return Receipt Requested, postage prepaid. The written notice will give Debtor a 10-day period to cure the default. Cure payments must be made by certified funds only and Movant may charge Debtor \$50.00 for any notice given pursuant to this Order. In the event Debtor fails to cure such delinquent payments within such 10-day period,

Debtor: Jonothan Foreman
Case No.: 22-16089-VFP
Caption of Order: Consent Order Modifying Stay as to Motor Vehicle

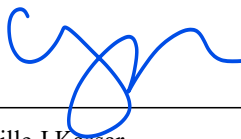
or in the event Debtor become delinquent after two (2) notices of default, the Automatic Stay of 11 U.S.C. §362 shall terminate as it relates to Movant and the Collateral. If the stay terminates pursuant to this Agreed Order, Movant shall be allowed to enforce all its rights and remedies in the Collateral as permitted under Contract and State law, and if applicable, permitted to file an unsecured claim for any remaining deficiency balance.

4. In the event Debtor convert to a bankruptcy under any Chapter other than Chapter 13 of the Bankruptcy Code, then Debtor shall pay all total arrears due and owing within fifteen (15) days from the date the case is converted from Chapter 13 to any other Chapter. If Debtor fails to make payments in accordance with this paragraph, then Movant, through counsel, may file a Certification of Default setting forth and failure and Movant shall be granted immediate relief from the automatic stay provisions of Section 362 of the Bankruptcy Code (11 U.S.C. § 362) the Movant is then permitted to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating and completing a sale of the motor vehicle.

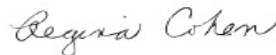
5. The failure of Movant to issue a notice of default will not be construed or act as a waiver of any of the rights of Movant under the Consent Order.

6. Debtor waive the fourteen (14) day stay provided under Rule 4001(a)(3), F.R.B.P.

We hereby consent to the form and entry of the foregoing Order.



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Attorney for Movant

In re:
Jonothan Foreman
Debtor

Case No. 22-16089-VFP
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-2
Date Rcvd: Mar 14, 2023

User: admin
Form ID: pdf903

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 16, 2023:

Recip ID	Recipient Name and Address
db	+ Jonothan Foreman, 24 Mountain Avenue, West Orange, NJ 07052-5033

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 16, 2023

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 14, 2023 at the address(es) listed below:

Name	Email Address
Camille J Kassar	on behalf of Debtor Jonothan Foreman ckassar@locklawyers.com bbkconsultantllc@gmail.com,tdell@locklawyers.com,ckassar@locklawyers.com,kassarcr75337@notify.bestcase.com
Denise E. Carlon	on behalf of Creditor Deutsche Bank National Trust Company as Trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Trust 2007-CH3 Asset Backed Pass-Through Certificates, Series 2007-CH3 dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Marie-Ann Greenberg	magecf@magtrustee.com
Regina Cohen	on behalf of Creditor Ally Capital rcohen@lavin-law.com mmalone@lavin-law.com
U.S. Trustee	USTPRegion03.NE.ECF@usdoj.gov

District/off: 0312-2

User: admin

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Date Rcvd: Mar 14, 2023

Form ID: pdf903

Total Noticed: 1

TOTAL: 5